

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF MASSACHUSETTS**

**In Re:**

**John Malone,**

**Debtor**

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**Chapter 13**

**Case No. 24-10885**

**MOTION TO APPROVE SECOND AMENDED CHAPTER 13 PLAN**

Now comes the Debtor and moves for approval of his Second Amended Chapter 13 Plan. In support of this motion, Debtor states the following:

1. Debtor filed for Chapter 13 bankruptcy protection on May 8, 2024.
2. Debtor's Second Amended Chapter 13 Plan makes the following changes:
  - a. Clarifies that all secured creditors will be paid in full from the sale of the real estate;
  - b. Adds the administrative claim for current counsel and removes the claim from prior counsel;
  - c. Increases the dividend to general unsecured creditors to 100%;
  - d. Adds that a lump sum payment is due by Debtor from the sale of the house.

WHEREFORE, Debtor requests the Court allow as follows:

1. Approval of his Second Amended Chapter 13 Plan.
2. For such other and further relief as this court deems just.

Dated: October 9, 2025

Debtor,  
by his attorney,

/s/ John Ullian  
John Ullian, Esq.  
The Law Firm of Ullian and Associates, P.C  
220 Forbes Road, Suite 106  
Braintree, MA 02184  
(781) 848-5980  
BBO No. 542786

**CERTIFICATE OF SERVICE**

I John Ullian, hereby certify under the pains and penalties of perjury that I served the foregoing **MOTION TO APPROVE SECOND AMENDED CHAPTER 13 PLAN** by ECF or by mailing a copy of same postage prepaid to interested parties listed below and everyone on the attached matrix.

Richard King  
Office of the US Trustee  
J.W. McCormack Post Office & Courthouse  
5 Post Office Sq., 10th Fl, Suite 1000  
Boston, MA 02109

Carolyn Bankowski  
Chapter 13 Trustee Boston  
P. O. Box 8250  
Boston, MA 02114

John Malone  
28 Savin Hill Avenue  
Dorchester, MA 02125

American Building Construction, Inc.  
82 Union St.  
Quincy, MA 02169

28 Berkshire Ave LLC  
Peter Pasciucco  
50 Redfield Street, Suite 201  
Boston, MA 02122

The Bank of New York Mellon  
Marcus Pratt  
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Boston Water and Sewer Commission  
Janet M. Mahoney, Assistance General Counsel  
980 Harrison Avenue  
Boston, MA 02119

Chloe, LLC  
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Andrew Coppo  
Greater Boston Title & Escrow LLC  
60 Adams Street, #207  
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Elsie Dias  
Age Strong Commission  
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Boston, MA 02201

Federal Home Loan Mortgage Corporation/NewRez  
Brian M Kiser  
Marinosci Law Group, P.C.  
275 West Natick Road, Suite 500  
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Federal Home Loan Mortgage Corporation  
Jason Giguere  
Zwicker & Associates, P.C.  
80 Minuteman Road  
Andover, MA 01810

Federal Home Loan Mortgage Corporation  
Joseph Dolben  
Harmon Law Offices, P.C.  
150 California Street  
Newton, MA 02458

Date: October 9, 2025

/s/ John Ullian  
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Label Matrix for local noticing  
0101-1  
Case 24-10885  
District of Massachusetts  
Boston  
Thu Oct 9 08:58:26 EDT 2025

Chloe, LLC  
c/o Ehrhard & Associates, P.C.  
27 Mechanic Street, Suite 101  
Worcester, MA 01068 United States 01608

Attn: Massachusetts Dept. of Revenue  
Bankruptcy Unit  
PO Box 7090 Boston, MA 02204

City of Boston Real Estate Tax  
CITY OF BOSTON, BOX 55808  
Boston, MA 02205

Fed Home Loan Mortgage Corp as Trustee  
c/o Specialized Loan Servicing  
P.O. Box 636005  
Littleton, CO 80163-6005

Janet M. Mahoney  
Deputy General Counsel  
Boston Water and Sewer Commission  
980 Harrison Avenue  
Boston, MA 02119-2530

The Bank of NY Mellon Indenture Trustee  
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475 Cross Point Pkwy PO Box 9000  
Getzville, NY 14068-9000

Carolyn Bankowski-13-12  
Chapter 13-12 Trustee Boston  
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Discover Bank  
2479 Edison Blvd, Unity A  
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Federal Home Loan Mortgage Corp. Trustee (Se  
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(fka Specialized Loan Servicing LLC)  
6200 S. Quebec Street, Suite 300  
Greenwood Village, Colorado 80111-4720

National Grid  
P.O. Box 371338  
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The Bank of New York Mellon  
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Fed Home Loan Mortgage Corp as Trustee  
26 Savin Hill Ave  
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Federal Home Loan Mortgage Corp. Trustee for  
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Specialized Loan Servicing LLC  
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